L-0034

May 22, 2003

Michael Collins U.S. Department of Energy Richland Operations Office P.O. Box 550, MSIN A6-38 Richland, WA 99352

RE: USDOE Actions at Hanford

Dear Sir

Since 1906, The Mountaineers have been concerned with issues that challenge the health of the environment across Washington State. Our membership, over 13,000, is made up of branches in Olympia, Tacoma, Seattle, Everett, Bellingham, and Wenatchee. Our members explore the entire state's landscape to hike, climb, photograph, backpack, snowshoe, kayak, and simply enjoy Washington. It is with this perspective that we respond, as we have before, to the state of the Hanford facility.

As you know, production of weapons-grade plutonium has made the 560 square mile Hanford facility in Eastern Washington one of the most contaminated sites in the world. The Hanford facility sits on the banks of the Columbia River, one of our region's most valuable natural resources. In 1986, the United States Department of Energy (DOE) made public thousands of documents showing there had been off-site releases of radiation as well as considerable contamination of the site.

The DOE's mission at Hanford since 1989 has been cleanup. USDOE, the Washington Department of Ecology, and the US Environmental Protection Agency, working via the "Hanford Federal Facility Agreement and Consent Order," also called the "Tri-Party Agreement" (TPA), have previously established two legally binding consent agreement vitrification cleanup schedules by which the DOE was to bring the Hanford site into compliance with state and federal environmental laws.

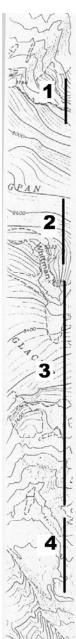
Unfortunately DOE failed to meet the cleanup schedule of the first of these agreements, and has now made an end run around the second by developing a plan to eliminate vitrification of 75% of the nation's High-Level Nuclear Wastes from nuclear weapons production, much of which resides at Hanford. Included in the fallout of this plan was the shipment of an initial 170 barrels of "Remote-Handled Transuranic" (RH TRU) wastes to Hanford. Additional shipments of RH TRU waste, as well as an additional 70,000 truckloads of low level solid and mixed waste are planned.

In return for Washington State acceptance of these additional waste shipments, DOE promised to renegotiate the second consent agreement with the office of the State

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Attorney General. However, the second consent agreement itself was legally binding, without Washington State being required to take on more waste. Yet even after Washington State agreed to accept more waste, DOE failed in its promise of a new cleanup timetable.

The National Environmental Policy Act (NEPA) requires a comprehensive look at all the impacts in bringing waste to Hanford, including risk of accident, impact to the soil and ground water. Further, the State of Washington has jurisdiction over solid and mixed waste under Ecology's Model Toxics Control Act (MTCA).

All alternatives of the revised Solid Waste Environmental Impact Statement (hereafter referred to as the SWEIS) include import of TRU waste, in addition to 12.7 million cubic feet of Low Level and Mixed Low Level Waste (LLW and MLLW) to Hanford, with the exception of the "stop work" alternative, which stops all cleanup work at Hanford. This is not a valid alternative, because USDOE is obligated under existing laws to proceed with cleanup.

Inbound RH TRU waste contains long-lived radioisotopes such as plutonium, and emits at least 200 mrem (20 full body xrays) per hour of radiation at the waste package surface. In addition, the SWEIS states that the TRU waste may also contain hazardous components; ie mixed TRU. USDOE has violated manifesting, tracking, and reporting requirements, and has not characterized the hazardous wastes of the incoming TRU shipments, in violation of RCRA, the Washington Hazardous Waste Management act, and the Hanford Site RCRA Permit. Further, documents received by Ecology state that some of this material has radiation levels that "preclude current visual, chemical, and NDE verification at Hanford."

These problems intensify all aspects of the issues related to the import of RH TRU, including potential environmental impacts of transportation, which the SWEIS still fails to adequately address. The SWEIS lists dozens of chemical and radiological releases associated with on site accidents, but continues to address off site transportation accidents only in terms of the historical number of traffic fatalities. Greg DeBruler, technical consultant for Columbia Riverkeeper has noted "We have to protect the interests of our groups' member families along these truck routes, to protect against our families being radiated by passing shipments, as well as from the never disclosed risks of accidents or terrorist incidents involving truckloads of Plutonium and chemical wastes."

USDOE says the imported RH TRU will eventually be shipped to the Waste Isolation Pilot Plant (WIPP) in New Mexico. However, the SWEIS notes that the capacity to process, certify, and ship RH TRU to WIPP is not available anywhere, and would require new facilities and processing operations at Hanford. It also notes that DOE's hazardous waste permit for WIPP, issued by the state of New Mexico Environment Department, currently authorizes neither the disposal of RH TRU nor TRU commingled with PCBs.

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Michael Collins May 22, 2003 Page 3 The SEIS provides sophisticated modeling output data, as well as a cumulative risk analysis, but does not present a complete inventory of either radionuclides or conventional hazardous waste contamination already at Hanford. In fact, because of the lack of characterization of much contamination, both on site and from imported waste streams, which provide input data to the models, model output data would appear to be suspect. All of the above suggests that the new imported waste streams, both those proposed for storage and those proposed for processing and disposal, will only contribute to the current serious environmental problems at Hanford. Based on history, DOE has lost much credibility for meeting established deadlines, upholding legally binding agreements, and addressing serious public concerns. We oppose DOE's proposed import of any additional waste to Hanford, and support the lawsuit filed by Heart of America Northwest, Columbia Riverkeeper, Sierra Club, and Washington Physicians for Social Responsibility, as well as the lawsuit filed by Washington State to stop the planned plutonium shipments. Sincerely, THE MOUNTAINEERS Attorney General Christine Gregoire Department of Energy Secretary Spencer Abraham Environmental Protection Agency Administrator Christie Todd Whitman (206) 284-6310 300 THIRD AVE. WEST SEATTLE, WA 98119 FAX (206) 284-4977

May 23, 2003

Michael Collins Richland Operations Office U.S. Department of Energy A6-38 P.O. Box 550 Richland, Washington 99352

Mr. Collins:

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- Please stop the madness -- I implore you, no further import of radioactive waste coming into the state of Washington, and specifically Hanford, Transuranic or otherwise.
- The waste issue has been a concern of mine since 1976, when we were promised a vitrification plant and it has never come into being. I don't need to recite to you what's happening with all the radioactive trash that is currently at Hanford and the dangers to our Northwest region, the groundwater and the Columbia. You well know the dangers.
 - I am nearing eighty and hoped that in my lifetime we would stop fouling our nest -- but that is probably not to be. However, I am concerned for your and my children, grandchildren and future generations, if they are to be.
- Again, please, no more new radioactive waste shipped to Hanford, clean up the onsite waste, and shut down the unlined god-awful trenches.

Search your conscience and stop this insanity now.

Sincerely and still with hope,

Rosalie Gittings 0 3317-B windolph NW Olympia WA 98502

Jesalie Villias

Michael Cellins U.S. Deft & Energy Rillond Wa Margaret Longhurst 1890 SW Filmont Ave Portland, OR 97225

Dear Mr Collins, May 27 2003 Being a former rocket 1 av not conserved about you en my grandskelden. Please stop all afecture impost of radioactive and chemical worter to Hanford for banend, Also 3 trenches inamedeately. ta the sake of future generations do the right thing

Seneraly yours fall Van Wyle May 29, 2003

Michael Collins USDOE PO Box 550,A6-38 Richland, WA 99352

Dear Mr. Collins,

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Transportation of high level nuclear waste across our country poses as unacceptable, unfathomable risk. Since 9-11, jet fueled aircraft flying at hundreds of miles per hour has not been factored into the Environmental Impact Statements of any proposed nuclear waste transportation plan.

It is not possible to build enough safety into the trucks or waste containers to withstand that kind of impact. Therefore, high level nuclear waste should remain where it is presently.

On another subject, since I am a Washingtonian, the milestones for clean-up of the contaminated Hanford Nuclear Reservation have not been met. In view of that fact, it is inconceivable to even consider bringing more waste to Hanford.

I taught Radiation Use and Safety for over 20 years and I served three years on the Nuclear Waste Advisory Council for the state of Washington under a gubernatorial appointment. For the last two years of my appointment to the Council, I served as chair of the Transportation subcommittee. My concerns are based on my knowledge of the effects of radiation on the human body as well as the creation, transportation and storage of nuclear waste.

Please consider my concerns and include them as part of the public comments on both of these subjects.

Sincerely yours,

Nancy Korb

13221 SE Forest St.

Vancouver, WA 98683-6531

ancy Korb

cc: Senator Patty Murray, Senator Maria Cantwell and Governor Gary Locke